

Positions Regarding Mediation or ADR: The Parties are amenable to mediation or ADR. The Plaintiffs believe that mediation or ADR would be most effective after the parties have conducted some meaningful discovery. The Parties intend to confer again in the next month to discuss selecting a mutually agreeable mediator and possible dates for mediation in 2021.

Respectfully Submitted,

By: /s/ Michelle Simpson Tuegel

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